

In the Matter of )  
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 ) RM-11346  
Changes in Part 97 )  
With regard to Amateur )  
Radio Service Rules, )  
97.119(a) Station Identification )

To: The Commission

Comments by Donald B. Chester

Continuously licensed since 1959, I have held an Amateur Extra Class operator licence since 1963. My amateur radio call sign is K4KYV. My comments are as follows.

Mr. Murray Green has proposed to amend Section 97.119(a) to require an amateur station to transmit its assigned call sign at least once every thirty minutes during a communication. The present rules require station identification at intervals of at least once every ten minutes.

Mr. Green states that this change would harmonize the identification requirements of the Amateur Radio Service with other radio services the Commission regulates.

I concur with Mr. Green that the present ten-minute ID requirement is overkill and represents an abundance of caution, requiring amateur radio operators to inordinately interrupt the thread of their conversation or communication with frequent station identification. The present ID requirement is particularly cumbersome for large groups of amateur stations participating in nets or roundtables.

However, I believe that the proposed maximum interval of thirty minutes would be too long for the amateur service, due to the nature of amateur radio communication in which a station's entire communication or conversation may be much less than 30 minutes, the fact that amateur stations operate on random frequencies within their allocated bands, and that the expected level of interference and variations in ionospheric propagation may not permit continuous reception of a specific station for a period as long as thirty minutes.

Many of the comments submitted so far in response to this petition indicate a preference to keep the amateur identification requirements exactly as they are at present. Most of those comments advocate the specific time interval of ten minutes solely because they oppose Mr. Green's proposal, and the fact that ten minutes has long been the requirement in the U.S. amateur rules. Few comments attempt to address the merits of the specific figure of ten minutes or why this might be preferable to some other possible interval, other than Mr. Green's proposed figure of thirty minutes.

Some insight and perspective might be provided from the rules of another radio service regulated by the Commission, and from the Amateur Radio Service rules of two other nations.

Communication using the U.S. **General Mobile Radio Service** (GMRS) is similar to communication in the Amateur service in that communications may be of a personal nature, transmissions may vary in length, and licensees are not limited to a specific channel or frequency, but may randomly appear on any one of several communication channels allocated to that service, which are available to GMRS systems on a shared basis and will not be assigned for the exclusive use of any licensee. All operators and licensees must cooperate in the selection and use of channels to reduce interference and to make the most effective use of the facilities.

Identification requirements are as follows:

47 CFR Part 95 - Subpart A General Mobile Radio Service (GMRS) - Sec. 95.119

Station identification.

- (a) Except as provided in paragraph (e), every GMRS station must transmit a station identification: (1) Following the transmission of communications or a series of communications; and (2) Every 15 minutes during a long transmission.

Station identification requirements in the Amateur Radio Service in the **United Kingdom** are as follows:

13(1) The Licensee, or, if this Licence is a Full Licence, then any other authorised person who uses the Radio Equipment, shall transmit the Callsign specified in Section 1 of this Licence and any modifier applicable under the provisions of this Licence:

- (a) during initial calls (“CQ” calls) or calls to establish contact with another Amateur;
- (b) at least once during each transmission and additionally when the period of transmission is longer than **15 minutes**, at the end of each transmission;
- (c) at least once every **15 minutes** during net operations;
- (d) whenever the frequency of transmission is changed, at the beginning of transmission on the new frequency;

On the other hand, the **Canadian** Amateur Service rules require identification at least once every thirty minutes, just as Mr. Green proposes for the U.S. Amateur Service:

Industry Canada  
Radiocommunications and  
Broadcasting Regulatory Branch

## 9. Station Identification

9.1 The operator of an amateur station in Canada shall identify the station by transmitting the call sign assigned to that station.

9.3 The operator of any amateur station shall transmit the applicable identification referred to in subsection (9.1) or (9.2), in English or in French, at the beginning and at the end of each period of exchange of communication or test transmission, and at intervals of not more than **30 minutes** throughout the period of exchange of communication.

I believe that the identification interval in the rules governing the U.S. GMRS service and in the rules governing the Amateur Radio Service in the United Kingdom, represents a reasonable requirement that would adequately fulfil the purpose of the identification requirement in Section 97.119 of the Commission’s rules while according U.S. amateurs a measure of relief from the present ten-minute requirement. Therefore, my proposal would be a more modest increase in the maximum time interval between station identification in the U.S. Amateur Radio Service to **fifteen** minutes, by amending Part 97 as follows:

### § 97.119 Station identification.

- (a) Each amateur station, except a space station or telecommand station, must transmit its assigned call sign on its transmitting channel at the end of each communication, and at least every **15 minutes** during a communication, for the purpose of clearly making the source of the

transmissions from the station known to those receiving the transmissions. No station may transmit unidentified communications or signals, or transmit as the station call sign, any call sign not authorized to the station.

Respectfully submitted,

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29 November, 2006